

Exhibit B

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA, S.K.,
TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**PLAINTIFF NATIONAL TPS
ALLIANCE'S REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
DEFENDANT U.S. DEPARTMENT OF
HOMELAND SECURITY (SET TWO)**

1 Additional Counsel for Plaintiffs

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PROPOUNDING PARTY: Plaintiff National TPS Alliance

RESPONDING PARTY: Defendant U.S. Department of Homeland Security

NO.: Two

Plaintiff National TPS Alliance hereby requests that Defendant U.S. Department of Homeland Security (“DHS”) produce for inspection and photocopying all documents and tangible things responsive to the categories described below to the attention of Emilou MacLean at the offices of ACLU of Northern California, 39 Drumm St., San Francisco, CA 94111 or via electronic submission to Plaintiffs’ counsel. For purposes of responding to these requests, in addition to producing responsive documents and communications maintained in centrally located systems, folders (electronic or physical), or databases, responsive documents and communications should be produced for the custodians identified or described in the attached Exhibit 1 – Custodians.

REQUEST FOR PRODUCTION NO. 4:

All draft and final USCIS Decision Memoranda concerning all 2025 TPS periodic reviews.

REQUEST FOR PRODUCTION NO. 5:

All draft and final country conditions analyses prepared in connection with all 2025 TPS periodic reviews, and communications related to these country conditions analyses.

Date: August 18, 2025

Respectfully submitted,

NATIONAL DAY LABORER
ORGANIZING NETWORK

/s/ Jessica Karp Bansal

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Attorneys for Plaintiffs

Exhibit 1 - Custodians

- I. Individuals Who Have Signed Records of Clearance and Approval for 2025 TPS Decisions
- II. Senior DHS Leadership
 - A. DHS Secretary Kristi Noem
 - B. DHS Secretary Kristi Noem’s Executive Assistant
 - C. DHS Senior Advisor Corey Lewandowski
 - D. DHS Senior Counselor Rob Law, Nominee for DHS Undersecretary, Office of Strategy, Policy and Plans
 - E. DHS Deputy Secretary Troy Edgar
 - F. DHS Senior Advisor and General Counsel Nominee James Percival
 - G. DHS Senior Advisor Joseph Guy
 - H. (Former) DHS Senior Advisor Joe Edlow
- III. DHS Office of General Counsel (who have been leading the early TPS decisionmaking process)
 - A. General Counsel
 - Joseph Mazzara
 - B. Personnel Involved in TPS Decisionmaking
 - Christina McDonald, Associate General Counsel for Regulatory Affairs
 - Nader Baroukh
- IV. USCIS Senior Leadership
 - A. USCIS Director
 - Jennifer Higgins
 - Kika Scott
 - Joe Edlow
 - B. USCIS Chief of Staff to Director
 - Aaron Calkins
- V. USCIS Subject Matter Experts—Office of Policy & Strategy (OP&S)
 - A. Chief
 - Samantha Deshommes
 - B. Policy Advisor (with a role related to TPS)
 - Amany Ezeldin
 - Karine Noncent
 - Andrew Block
 - Ruhee Vagle
 - Rabia Elhage
 - Carly Salazar
 - C. Humanitarian Affairs Division
 - Rena Cutlip Mason, Division Chief

- Sasha Ridley
- Diana Stapp
- Jennifer Arthungal

VI. USCIS Country Conditions Experts—Refugee, Asylum and International Operations Directorate (RAIO)

- A. Associate Director Ted Kim
- B. RAIO personnel involved in country conditions reviews or analysis for TPS

VII. USCIS Operational Personnel—Service Center Operations Directorate

- A. Associate Director Connie Nolan

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August, 2025, I served, or caused to be served, the foregoing document described as **PLAINTIFF NATIONAL TPS ALLIANCE'S REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT U.S. DEPARTMENT OF HOMELAND SECURITY (SET TWO)** via email at the email address(es) listed below:

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Attorneys for the Defendants

/s/ Jessica Karp Bansal
Jessica Karp Bansal